

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

THERESA THORNTON,

Plaintiff,

V.

**SAINT LOUIS UNIVERSITY, and
STANDARD INSURANCE COMPANY,**

Defendants.

CASE NO. 4:25-CV-00208-SEP

MOTION FOR RECONSIDERATION

Defendant Standard Insurance Company (“Standard”) respectfully requests that the Court reconsider its June 23, 2025 Order denying Standard’s Motion for Leave to Appear Remotely at Scheduling Conference (“Motion for Leave”). (Doc. 28). In support of this request, Standard states:

1. In its Motion for Leave, Standard requested permission for its counsel, Ann-Martha Andrews, to appear remotely (via Zoom videoconference or telephone) at the Rule 16 Scheduling Conference set for July 1, 2025, at 11:00 a.m. pursuant to the Court's Order Setting Rule 16 Conference. Doc. No. 20.

2. In its Motion for Leave, Standard explained that Standard's lead counsel, Ann-Martha Andrews, lives and works in Phoenix, Arizona. To appear in person at the scheduling conference in St. Louis, Missouri would require at least one day of air travel, and possibly an overnight stay depending on flight availability and timing. To appear in person, Ms. Andrews would be required to miss at least one day of work and would have to make arrangements for the care of her household. Standard would incur significantly higher fees, plus costs, should Ms. Andrews be required to appear in person.

2. Standard also indicated that Stone T. Hendrickson is local counsel but failed to clarify that Mr. Hendrickson, while licensed in the State of Missouri, lives and practices in Birmingham, Alabama.

3. The parties have submitted a joint proposed scheduling plan in which they agree on all essential matters. The parties have also agreed to schedule an early mediation.

4. Standard assures the Court that Ms. Andrews will be prepared meaningfully to participate in the scheduling conference via videoconference or by telephone, and that her remote appearance will not prejudice any party or hamper the efficient running of the conference.

5. Counsel for Standard conferred with Plaintiff's counsel about this request, and Plaintiff has no objection to Standard's Motion for Leave.

6. Accordingly, in light of the fact that neither of Standard's attorneys are physically located in the Eastern District of Missouri, Standard respectfully requests that the Court reconsider its June 23, 2025 Order and grant Standard's Motion for Leave for Ms. Andrews to attend the scheduling conference via video conference or telephone.

Dated: June 23, 2025

Respectfully submitted,

/s/ Ann-Martha Andrews

Ann-Martha Andrews, *Pro Hac Vice*

Stone T. Hendrickson, #74384MO

Attorneys for Standard Insurance Company

OF COUNSEL:

MAYNARD NEXSEN P.C.

2025 N. 3rd Street, Suite B300
Phoenix, AZ 85004
Telephone: 480.530.2962
aandrews@maynardnexsen.com

1901 Sixth Avenue North, Ste. 1700
Birmingham, AL 35203-2618
Telephone: 205.254.1000
Fax: 205.254.1999
shendrickson@maynardnexsen.com

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will provide electronic service to all counsel of record.

/s/ Ann-Martha Andrews
Ann-Martha Andrews